

J. TONY SERRA SBN 32639
3330 GEARY BLVD., THIRD FLOOR EAST
SAN FRANCISCO, CA 94118
TELEPHONE: (415) 986-5591
FACSIMILE: (415) 421-1331

MICHAEL HINCKLEY SBN 161645
803 Hearst Avenue
Berkeley, California 94710
Telephone: (415) 706-1386
Email: mike@mhlaw.us

Attorneys for Defendant
JOSE INEZ GARCIA-ZARATE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO VENUE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE INEZ GARCIA-ZARATE

Defendant.

Case Nos. 3:17-cr-00609 VC

DEFENDANT JOSE INEZ GARCIA-ZARATE'S SUPPLEMENTAL SENTENCING MEMORANDUM AND OBJECTIONS TO THE PSR

Date: June 6, 2022
Time: 9:30 a.m.
Hon. Vince Chhabria

Yesterday evening the defense filed Defendant Jose Inez Garcia-Zarate's Sentencing Memorandum and Objections to the PSR. The defense requested the Court impose a sentence of not more than credit for time served. After conferring with the BOP this morning it is clear that a credit for time served sentence will not achieve the intended results, i.e., that Garcia Zarate complete this case, be taken to address his other pending matters, and be taken to Mexico. To effectuate this intent the defense

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1 amends its request from credit for time served to a request for a custodial sentence within the applicable
2 guideline range, but not more than 6 years.

3 Dated: May 31, 2022

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5 Respectfully submitted,

6 */s/ J. Tony Serra*

7 By _____

8 J. TONY SERRA

9 */s/ Mike Hinckley*

10 By _____

11 MIKE HINCKLEY